

DOE-ID NEPA CX DETERMINATION

Idaho National Laboratory

SECTION A. Project Title: MFC-782 Air Compressor System Modifications

SECTION B. Project Description and Purpose:

This Environmental Compliance Permit (ECP) is to modify the current air compressor system at MFC-782. The existing compressed air system for MFC-782 is unable to keep up with the growing demand of the fabrication shop. The existing air compressor is undersized. In the summer months it will often shut down from overheating due to a lack of ventilation and temperature control in the existing compressor shed, which was fabricated from corrugated metal. A lack of compressed air for the fabrication shop causes difficulties with adequately running machinery which leads to project delays.

Modifications will include the following:

- Removal of the existing air compressor, air dryer, and compressor shed
- Installation of a new larger air compressor, air dryer, and fabricated compressor shed
- Installation of compressed air tanks in the air compressor system

The new compressor will be powered by electricity as was the old compressor. The new compressor shed will be installed in the same location as the existing shed, on the east side of MFC-782. The existing concrete foundation will be excavated, and a new foundation will be created for the new shed. Inside MFC-782 the compressed air main header will be upsized and tied together to form a feed through loop to eliminate "dead legs" in the system. The work will be performed by a subcontractor. These changes will address inadequate availability of compressed air in the fabrication shop and will allow for future growth.

SECTION C. Environmental Aspects or Potential Sources of Impact:

Air Emissions

Activities addressed have the potential to contribute to air emissions through the operation of fuel burning equipment and the use of maintenance equipment. If mobile sources (equipment) will be used temporarily, they must meet Idaho Administrative Procedures Act (IDAPA) 58.01.01.625 visible emission opacity requirements.

Fugitive dust will likely be generated during proposed work

Discharging to Surface-, Storm-, or Ground Water

N/A

Disturbing Cultural or Biological Resources

N/A

Generating and Managing Waste

The project activities will generate industrial (non-hazardous, non-radioactive) wastes such as scrap metal, plastic, concrete, and packaging material. Potential waste materials will be evaluated for waste minimization prior to generation, and industrial waste generated during proposed activities will be evaluated for recycling opportunities prior to disposal at the INL Landfill Complex.

All solid waste will be managed by WGS using approved laboratory procedures.

Releasing Contaminants

Typical construction chemicals such as fuels, lubricants, adhesives, concrete, concrete cure, etc., will be used and will be submitted to chemical inventory lists with associated Safety Data Sheets (SDSs) for approval in the vendor data system prior to use.

Although not anticipated, there is a potential for spills when using chemicals or fueling equipment.

Using, Reusing, and Conserving Natural Resources

All materials would be reused and/or recycled where economically practicable. All applicable waste would be diverted from disposal in the landfill where conditions allow, waste will be evaluated for recycling opportunities.

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SECTION D. Determine Recommended Level of Environmental Review, Identify Reference(s), and State Justification: Identify the applicable categorical exclusion from 10 Code of Federal Regulation (CFR) 1021, Appendix B, give the appropriate justification, and the approval date.

For Categorical Exclusions (CXs), the proposed action must not: (1) threaten a violation of applicable statutory, regulatory, or permit requirements for environmental, safety, and health, or similar requirements of Department of Energy (DOE) or Executive Orders; (2) require siting and construction or major expansion of waste storage, disposal, recovery, or treatment or facilities; (3) disturb hazardous substances, pollutants, contaminants, or Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA)-excluded petroleum and natural gas products that pre-exist in the environment such that there would be uncontrolled or unpermitted releases; (4) have the potential to cause significant impacts on environmentally sensitive resources (see 10 CFR 1021). In addition, no extraordinary circumstances related to the proposal exist that would affect the significance of the action. In addition, the action is not “connected” to other action actions (40 CFR 1508.25(a)(1)) and is not related to other actions with individually insignificant but cumulatively significant impacts (40 CFR 1608.27(b)(7)).

References:

10 CFR 1021, Appendix B to subpart D, items B1.15 “Support Buildings” and B1.31 “Installation or relocation of machinery and equipment”

Justification:

The proposed activities are consistent with CX B1.15 “Support buildings. Siting, construction or modification, and operation of support buildings and support structures (including, but not limited to, trailers and prefabricated and modular buildings) within or contiguous to an already developed area (where active utilities and currently used roads are readily accessible). Covered support buildings and structures include, but are not limited to, those for office purposes; parking; cafeteria services; education and training; visitor reception; computer and data processing services; health services or recreation activities; routine maintenance activities; storage of supplies and equipment for administrative services and routine maintenance activities; security (such as security posts); fire protection; small-scale fabrication (such as machine shop activities), assembly, and testing of non-nuclear equipment or components; and similar support purposes, but exclude facilities for nuclear weapons activities and waste storage activities, such as activities covered in B1.10, B1.29, B1.35, B2.6, B6.2, B6.4, B6.5, B6.6, and B6.10 of this appendix.”

They are also consistent with CX B1.31 “Installation or relocation of machinery and equipment. Installation or relocation and operation of machinery and equipment (including, but not limited to, laboratory equipment, electronic hardware, manufacturing machinery, maintenance equipment, and health and safety equipment), provided that uses of the installed or relocated items are consistent with the general missions of the receiving structure. Covered actions include modifications to an existing building, within or contiguous to a previously disturbed or developed area, that are necessary for equipment installation and relocation. Such modifications would not appreciably increase the footprint or height of the existing building or have the potential to cause significant changes to the type and magnitude of environmental impacts.”

Is the project funded by the American Recovery and Reinvestment Act of 2009 (Recovery Act) Yes No

Approved by Jason L. Anderson, DOE-ID NEPA Compliance Officer on: 08/03/2021